



March 20, 2025

VIA ELECTRONIC CASE FILING

Honorable Hector Gonzalez
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: KAIA BATTLE v. UNITED STATES OF AMERICA, THE PORT
AUTHORITY OF NEW YORK AND NEW JERSEY, JOHN DOES 1-4
Civil Action No.: 1:25-cv-1166-HG**

Dear Judge Gonzalez:

This office represents defendant Port Authority of New York and New Jersey in the above-referenced action, and I am the assigned attorney. I am writing to request an extension of time to respond to the Summons and Complaint in this case.

The original answer date in this case is March 31, 2025, and I am writing to request an extension of time to April 30, 2025. One of our staff has spoken with the office of plaintiff's counsel, and they have agreed to grant this extension, which is defendant's first request for additional time. This extension of time does not affect any other scheduled dates. I thank the Court for consideration of this application.

Respectfully submitted,

/s/ David Kromm
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cc: Sara J. Wolkensdorfer, Esq.
Attorneys for Plaintiff
(via ECF)